

South Oxfordshire Local Plan 2034

Page 3: Part A - contact details

Q1. Are you responding as an:

Business / Organisation

Page 6: Business / organisation contact details

Q4. Due to the plan-making process including an independent examination, a name and means of contact is required for your comments to be considered:

Business / organisation name Kidmore End parish council
Contact name C/O Clerk to the council Mr Penfold
Address line 1 [REDACTED]
Address line 2 [REDACTED]
Address line 3 -
Postal town [REDACTED]
Postcode [REDACTED]
Telephone number [REDACTED]
Email address [REDACTED]

Page 7: Part B - your comments

Q5. For comments on the Local Plan, please provide the paragraph or policy to which your comments relates. You can view a list of policies here. If you wish to comment on one of the evidence documents or the policies maps, please state the document title as well as the paragraph or policy reference.

Document / Policy / Paragraph: local plan 2100-2034

Q6. Do you consider the Local Plan and supporting documents:

	Yes	No	Don't know	Not answered (OPTION HIDDEN FROM LIVE SURVEY)
are legally compliant?			X	
are sound?		X		
comply with the Duty to Co-operate?	X			

Q7. Please provide further information in relation to the previous question. e.g. why you do or do not consider the Local Plan to be legally compliant or sound.

We do not have the legal knowledge to state whether the documents are legally compliant or not.
We do not think the document is sound there are a number of issues that are of concern to the council, explained in this response
Comply with duty to co-operate yes–
However Reading BC draft Local Plan is stating housing densities for part of Reading Golf Club, Emmer Green of between 24 and 34 houses per hectare, whereas SODC is suggesting 70 houses per hectare for Reading , this is not compatible.
We agree with strategic objectives p21

Q8. Please set out any modifications you consider necessary to make the Local Plan legally compliant or sound, having regard to your comments above. (NB - any non-compliance with the duty to co-operate is incapable of modification at examination). It will be helpful if you could put forward your suggested wording of any policy or text as precisely as possible.

Housing Need and Numbers p Strat 5, p41 + p83 + SHMAA 2014
Suggested total number of houses in plan period 28,465 , p86
our calculations
The basic requirement is for 775 houses per year = 17,825
Plus the Oxford shortfall 4,950 = 22,775
Then add the Growth Deal 2,099 = 24,874
Add Change in Policy 3,326 = 28,200

However the Plan takes the houses built + plans passed to date = 15,726
Plus the Strategic Sites in the Plan Period 10,375 = 26,101
Plus an addition in the Strategic sites of 4,025 (to bring total to 14,400) = 30,126

Adding NDP's, Nettlebed and windfall, this total becomes 32,491 compared with 22,775 from the previous version, including the Oxford shortfall. This is an increase of 42%.

Why and for what purpose? Given the densities required to achieve this, the Green Belt around Oxford will become terraced housing with little green space and minimal occupant convenience e.g. on road parking, small gardens, or alternatively high rise developments in existing Green Belt.

The number of houses that are being suggested in the plan are too high, they are based on the SHMA which was completed in 2014 and therefore is nearly out of date (5 years) and will be out of date by the time this plan is ratified

The numbers for the growth deal are also based on the SHMA and too high for same reason as above. There is an uplift of 219 from the SHMA to the standard numbers in NPPF, the uplift from the Standard Numbers and the Actual housing that is coming forward goes from 556 to 1412 per year (32491 divided by 23) - (this will then really show the significant buffer they have in their plan) and is still significantly more than the SHMA of 775 per year

$775-556= 219$ – approx 30%. it has been hard to find the evidence to explain this uplift

There are concerns around the untested level of economic growth, especially in these uncertain times, BREXIT and aftermath.

Therefore the evidence for the housing numbers are out of date, the numbers are too high and unsound

Density of housing per hectare

There are concerns about the high density of housing in rural areas and AONB – 40 in smaller villages and 35 in other villages

In smaller and other villages this is likely to be out of keeping with the other housing in the villages
Currently housing density is 25 – 30 housing density and other villages 20 density, based on infill, so large increase in density. Density significantly contradicts infill policy H16 in Smaller Villages and Other Villages.

"other locations " Other Locations should be amended to Other Villages. Otherwise this implies that villages that are not classified or listed in appendix 7 should have this level of density. These villages are deemed to be in Open Countryside and is therefore not appropriate.

We do not understand why SODC is stipulating housing density for Reading when it has its own Local Plan, where the density is 40 per hectare

Reading local plan – Reading golf course, 3.75 hectares, suggest 90 – 130 houses = 130 houses = 35 per hectare and 90 = 24 houses per hectare, so 70 houses per hectare as SODC suggest is out of keeping with Reading and shows a lack of duty to co-operate

The Reading boundary with SODC is open countryside and is in the setting of the AONB

There are no strategic sites on the boundary with Reading

Strategic objective 1.1 is to focus growth and infrastructure on Science Vale (Page 28) therefore stating the housing density of Reading should be 70, same as other urban areas means it is not in agreement with the strategic objectives. There is no requirement in the Reading Emerging Local (stated) for SODC to take any of Reading's housing target (they have a duty of co-operation with other councils for this).

Suggested 3 bedroom dwelling with off road parking at 70 houses per hectare is not achievable in rural areas, to ensure that the character and distinctiveness of smaller villages, other villages and open countryside, particularly in the setting of the AONB and in identified conservation target area, (ENV 2) are not destroyed.

There needs to be smaller houses in rural settlements for younger and older members of the community

Redevelopment p113 policy H16

p113 – no site area limit on redevelopment, therefore this is a risk to rural areas and settlements of over development as it's a loophole

There should be a section on settlement categorization within redevelopment for open countryside, as larger plots are at risk of over development, out of character development on larger plots, this should be linked to the infill policy

There should be a working change to limit redevelopment in Smaller Villages and Other Villages to be in line with the infill limit of .2 ha (5-6 houses) and .1 ha (2-3 houses respectively).

Replacement Dwellings – Policy H18 p115

This policy could enable developers to build out of character densities on plots that are in open countryside as there is nothing linking this policy to any density commitment.

Smaller Villages H8 - p97

Agree with wording for smaller and other villages, p 97

Policy H3 - p90

Concern about the increase in housing in Henley – 15% factors that should be taken into consideration are current high levels of air pollution, restriction due to flood plains and traffic levels due to bridge and river crossing

Policy H3 - p90

Sonning Common already has NDP and houses are being built, the impact on the local infrastructure has been great, often the main road is clogged with traffic. There is a lack of infra structure to cope with the increased population in the village.

Housing numbers should not be increased until infrastructure has been improved, upgraded, for example, school places, GP surgeries, road structures and parking near retail services

The density of 45 for large villages is too high for villages in rural areas

Policy H9 - p99

The requirement for affordable housing should be strengthened, legally binding and imposed on developers.

The proposal for less than 10 homes for there to be a financial contribution , this should go to the area of development not to be redistributed for Affordable Homes in other areas of the district.

AONB landscape and countryside ENV 1 p169

Agree with support for the setting of the AONB and the consideration being given to visual impact from areas within the setting of the AONB

There is a need to protect areas on the very south of the district where there is a conservation area, ancient woodland and dry valley. There needs to be reference to the protection given to the boundary with Reading in the Emerging Reading Plan.

General - support

Support the purposes of policies set out in ENV1

Support the principles behind para 8.8 which lists those documents which will inform the identification of landscapes and their features which are of importance

Support the rejection of the strategic site options north of Reading on landscape, highway, sustainability and other site specific grounds

General – changes requested

Weight to be given to landscape and visual studies undertaken as evidence base by Neighbourhood Development Plans which support adopted NDP landscape policies

Where the NDP identifies a landscape as a 'valued landscape' this should be included in accordance with NPPF 170 a) where the NDP becomes part of the 'development plan'

More cross reference between Policy ENV1 and ENV2 to ENV10 as the biodiversity and heritage assets are also features of the landscape. The protection given in these policies and their text (as for example the last sentence of para 8.16 giving protection to Conservation Target Areas) should also be considered when applying ENV1.

The text of the spatial strategy should include a statement that development north of Reading would not be supported. The reasons for this are set out in the appeal decision for the land east of Peppard

Road, P16/S3630/O, reasons for refusal and appeal decision for The Elms, Tokers Green and land at the end of Hemdean Avenue. [hopefully once the decisions on the High Court challenge and appeal at the Elms have come out this will be confirmed]

Policy ENV1

The phrase 'and where possible' in section 1 1st bullet and Section 2 main text is out of date and is not in accordance with the wording in NPPF para 170 a) or 172 which does not distinguish between conserving and enhancing. Remove 'and where possible'.

We support inclusion of the setting of the AONBs in ENV1. The plan does not mention 'setting' of the AONB anywhere else. The supporting text should include a paragraph on why the setting has been included with a reference to CROW Act S.85.

Section 1 3rd bullet refers to NPPF para 172 wording for major development but should refer to footnote 55 includes the need to also 'take into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined'.

Section 1 4th bullet should add 'character, natural beauty and' before 'special qualities'. Footnote needed for 'Landscape and Visual Impact Assessment' to ensure that any LVIA in prepared in accordance with best practice: in accordance with the Landscape Institute's Guidelines for Landscape and Visual Impact Assessment Edition 3 2013.

Section 2 main text refers to 'features' that contribute to SODC's 'valued landscapes'. The plan does not say what or where these 'valued landscapes' are (it is assumed that this is more than the AONBs, Green Belt and the river Thames). It would not be correct to describe all of SODC's landscape as 'valued landscapes'. A valued landscape has been accepted as below:

The Stroud District Council v SS CLG and Gladman Developments Ltd [2015] EWHC 488 judgment explains at paragraph 13: The NPPF is clear: that designation is used when designation is meant and valued is used when valued is meant and the two words are not the same. To be valued, a landscape has to have demonstrable physical attributes which would take the site beyond ordinary countryside, rather than just popularity (paras. 9, 13-16). This was subsequently confirmed in Forest of Dean DC v Secretary of State for Communities and Local Government [2016] EWHC 2429 (Admin): A landscape was "valued" if it had physical attributes taking it out of the ordinary, and an absence of designation did not necessarily mean an absence of landscape value.

A valued landscape will have physical attributes (plural) which might include landscape features such as those listed i) to ix) but a valued landscape is the summation of those features within a landscape. The wording to Section 2 main text needs changing and SODC's valued landscapes need defining (particularly as SODC do not intend to identify local landscape area designations).

Most importantly Section 2 should acknowledge that landscapes are the sum of their attributes and not limited to the features of a landscape.

List of features i) to ix): Add:

'hedgerow trees' after 'hedgerows'; and tree lined watercourses to i) 'and their setting' to vii)

Other landscape features identified for conservation within landscape areas within those documents listed under para 8.8 (for example permanent pasture, species rich pasture, parkland and parkland features, ancient routeways and field patterns)

Para 8.8: these documents need to be described in full and dated either here or in a footnote. Add Oxfordshire Wildlife and Landscape Study, North Wessex Downs AONB Landscape Character Assessment 2002 and both AONB Management Plans which include a summary of the special qualities of the AONBs

Add to Section 3: 'and is appropriate in scale to' after 'enhances'

Add to Section 4: 'of a similar length' after 'compensatory planting'.

3rd Bridge – Thames River crossing at Reading – Trans 1B vi p152

Not in favour of 3rd bridge it will increase traffic coming to this rural area and not improve traffic flow or reduce air pollution , as shown in modelling

Other strategies should be further investigated to improve traffic flow to and from Reading

Lorries to go to M4 and A34 not A4074 when travelling to Oxford

More public transport for both side of Thames

More cycle lanes

The impact of traffic in adjacent areas and poor air quality in areas needs more consideration

Air Quality policy EP1 p189

Concerns for air quality in Henley, Caversham and Sonning Common, higher housing density = more cars and poorer air quality - in areas where air quality is already low.

The higher housing density conflicts with climate change proposals p23

Renewable Energy p210

Policy DES10, point 1, could be promotes and gives more weight to, currently says

"The council encourages schemes for renewable etc.

New developments should reduce carbon footprint

Electric charging points should be available on new housing

Why are developers not encouraged to build new houses with solar panels and other forms of green technology?

Retail Services - p219

Are important to smaller communities as they act as a community hub and should be protected and enhanced and easily accessible for all members of community

TC 3 – p219

How will you measure vitality and viability of centre as a whole. How is this concept defined and measured.

Q10. Would you like to participate at the oral part of the examination, which takes place as part of the examination process?

Yes

Q11. Would you like to comment on another policy or paragraph?

No

Page 106: Future contact preferences

Q354. As explained in our data protection statement, in line with statutory regulations you will be contacted by the programme officer (and where necessary the council) with relevant updates on the Local Plan. South Oxfordshire and Vale of White Horse District Councils have a shared planning policy database. If you would like to be added to our database to receive updates on other planning policy consultations, please tick the relevant district box(es) below:

I would like to be added to the database to receive planning policy updates for South Oxfordshire